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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TRASHAWN WILLIAMS,

Defendant.

Case No: 2:22-cr-00184-RFB-DJA

**Stipulation for a
Protective Order**

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the public or any third party not directly related to this case, the specified discovery provided in this case. The parties state as follows:

1. On August 16, 2022, a grand jury returned an indictment charging Williams with one count of *Felon in Possession of a Firearm*, in violation of 18 U.S.C. §§ 922(g) and 924(a)(2). ECF No. 13.

2. The government is in the process of preparing discovery to be produced to defendant. Part of the discovery includes a Facebook search warrant return that is approximately 45,997 pages in length, approximately 13,487 linked media files, and additional supporting documents (hereinafter “the Protected Material”).

1 3. The Protected Material may contain personal identifying information (“PII”) of
2 potential victims, witnesses, and unrelated persons to this investigation. The government
3 believes that dissemination of the Protected Material could reveal personal identifying
4 information of potential victims, witnesses, and persons unrelated to this investigation.

5 4. To facilitate discovery in an expedited fashion, the government seeks to produce
6 the Protected Materials without first reviewing and redacting PII. In order to protect the
7 potential victims, witness, and unrelated persons to this investigation, the parties intend to
8 restrict access to the Protected Material in this case to the following individuals: attorneys for
9 all parties, the defendant, and any personnel that the attorneys for all parties consider necessary
10 to assist in performing that attorneys’ duties in the prosecution or defense of this case, including
11 investigators, paralegals, experts, support staff, interpreters, and any other individuals
12 specifically authorized by the Court (collectively, the “Covered Individuals”).

13 5. Without leave of Court, the Covered Individuals shall not:

- 14 a. make copies for, or allow copies of any kind to be made by any other person
15 of the Protected Material in this case or permit dissemination of the Protected
16 Material to the public or third parties;
- 17 b. allow any other person to read, listen, or otherwise review the Protected
18 Material;
- 19 c. use the Protected Material for any other purpose other than preparing to
20 defend against or prosecute the charges in the indictment or any further
21 superseding indictment arising out of this case; or
- 22 d. attach the Protected Material to any of the pleadings, briefs, or other court
23 filings except to the extent those pleadings, briefs, or filings are filed under
24 seal, or first redacting any personal identifying information of individuals.

6. Nothing in this stipulation is intended to restrict the parties' use or introduction of the Protected Material as evidence at trial or support in motion practice.

7. The parties shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

8. The defense hereby stipulates to this protective order.

DATED this 30th day of August, 2022.

Respectfully submitted,

For the United States:

JASON M. FRIERSON
United States Attorney

/s/ Bianca R. Pucci
BIANCA R. PUCCI
Assistant United States Attorney

For the Defense:

RENE L. VALLADARES
Federal Public Defender

/s/ Joanne L. Diamond
JOANNE L. DIAMOND
Assistant Federal Public Defenders and
Attorneys for TRASHAWN WILLIAMS

IT IS SO ORDERED:



Honorable Richard F. Boulware, II
UNITED STATES DISTRICT JUDGE

September 12, 2022

Date